

# Water Compliance Inspection Report

## Section A: National Data System Coding (i.e., PCS)

Transaction Code		NPDES								yr/mo/day						Inspection Type		Inspector		Fac Type	
1	N		I	D	R	0	5	C	1	4	5	1	5	0	7	2	2	-	R	2	
Remarks																					
21																				66	
Inspection Work Days				Facility Self-Monitoring Evaluation Rating								BI		QA		Reserved					
67		7	0	69	70		71		72		73		74		75					80	

## Section B: Facility Data

Name and Location of Facility Inspected <i>(For industrial users discharging to POTW, also include POTW name and NPDES permit number)</i>  Pacific Steel and Recycling 2515 East Comstock Avenue Nampa, Idaho 83687	Entry Time/Date  9:00 AM/ 07/22/15	Permit Effective Date  09/29/08
	Exit Time/Date  12:55 PM/ 07/22/15	Permit Expiration Date  09/29/13
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)  Michael Cataldo/Regional Manager Recycling/(208) 941-1906 Kirby Farner/Environmental Compliance Specialist/(406) 791-8504	Other Facility Data <i>(e.g., SIC NAICS, and other descriptive information)</i>  SIC = 5093   Latitude: 43.591944 Longitude: -116.545	
Name, Address of Responsible Official/Title/Phone and Fax Number  Same as above.	Contacted <input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No	

## Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> <b>Records/Reports</b>	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

## Section D: Summary of Findings/Comments



*(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)*

SEV Codes	SEV Description
● ● ● ● ● ● ● ● ● ●	See the attached report.
● ● ● ● ● ● ● ● ● ●	
● ● ● ● ● ● ● ● ● ●	
● ● ● ● ● ● ● ● ● ●	

**RECEIVED**

JUL 26 2015

Inspection & Enforcement Management Unit  
(IEMU)

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Sandra Brozusky 	EPA/OCE/(206) 553-5317	07/26/15
Joseph Roberto	EPA/OCE/(206) 553-1669	07/26/15
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
	EPA/OCE/EMA 3-0855	7/27/15

ICIS  
7-28-15  
JR

# INSTRUCTIONS

## Section A: National Data System Coding (i.e., PCS)

**Column 1: Transaction Code:** Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

**Columns 3-11: NPDES Permit No.** Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

**Columns 12-17: Inspection Date.** Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

**Column 18: Inspection Type\*.** Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	\$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

**Column 19: Inspector Code.** Use one of the codes listed below to describe the *lead agency* in the inspection.

A —	State (Contractor)	O —	Other Inspectors, Federal/EPA (Specify in Remarks columns)
B ----	EPA (Contractor)	P —	Other Inspectors, State (Specify in Remarks columns)
E —	Corps of Engineers	R —	EPA Regional Inspector
J —	Joint EPA/State Inspectors—EPA Lead	S —	State Inspector
L ----	Local Health Department (State)	T —	Joint State/EPA Inspectors—State lead
N —	NEIC Inspectors		

**Column 20: Facility Type.** Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

**Columns 21-66: Remarks.** These columns are reserved for remarks at the discretion of the Region.

**Columns 67-69: Inspection Work Days.** Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

**Column 70: Facility Evaluation Rating.** Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

**Column 71: Biomonitoring Information.** Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

**Column 72: Quality Assurance Data Inspection.** Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

**Columns 73-80:** These columns are reserved for regionally defined information.

## Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

## Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

## Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

\*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

**NPDES  
Inspection Report**

**Pacific Steel and Recycling  
(NPDES Permit #: IDR05C145)**

**Nampa, Idaho**

**July 22, 2015**

**Prepared by:**

**Sandra Brozusky  
Environmental Protection Agency, Region 10  
Office of Compliance and Enforcement  
Inspection and Enforcement Management Unit**



**Table of Contents**

- I. Facility Information
- II. Inspection Information
- III. Scope of Inspection
- IV. Inspection Entry
- V. Compliance History
- VI. Facility Description/Background
- VII. Permit Information
- VIII. Permit Applicability and Requirements
- IX. Facility Tour
- X. Records Review
- XI. Stormwater Generation, Treatment and Discharge
- XII. Receiving Water
- XIII. Areas of Concern
- XIV. Closing Conference

**Attachments**

- A. Facility Aerial
- B. Photograph Documentation
- C. Stormwater Pollution Prevention Plan
- D. Notice of Intent
- E. Permit Coverage Letter
- F. Email Regarding Hardness Information
- G. Emails Regarding Entrance to Facility
- H. Email Regarding P.E. Certification for No Discharge



(Unless otherwise noted, all details in this inspection report were obtained from conversations with Michael Cataldo, Jacob Haun, Kirby Farner or from observations during the inspection.)

## I. Facility Information

Facility Name: **Pacific Steel and Recycling** (This is based on information provided in the Notice of Intent (NOI) submitted on April 23, 2009. This facility is also known as Pacific Steel and Recycling. For the purpose of this report, Pacific Steel and Recycling will also be identified as the “facility.”) See Attachment D for a copy of the NOI.

Operator: **Pacific Steel and Recycling** (This is based on information provided in the NOI submitted on April 23, 2009.) See Attachment D for a copy of the NOI.

Company Status: **Pacific Hyde and Fur Depot** is doing business as **Pacific Steel and Recycling**

Facility Contact(s):

Name	Title	Phone Number	Email Address
Michael Cataldo	Regional Recycling Manager	(208) 941-1906	<a href="mailto:Michael_Cataldo@pacific-recycling.com">Michael_Cataldo@pacific-recycling.com</a>
Jacob Haun	Assistant Manager	(208) 697-3589	<a href="mailto:Jacob_Haun@pacific-recycling.com">Jacob_Haun@pacific-recycling.com</a>
Kirby Farner	Environmental Compliance Specialist	(406) 791-8509	<a href="mailto:kirby_farner@pacific-steel.com">kirby_farner@pacific-steel.com</a>
Matt Brown	Consultant with Professional Construction Management	(208) 869-7555	<a href="mailto:mbrown@pcmbuild.com">mbrown@pcmbuild.com</a>

Physical Address: 2515 E. Comstock Ave  
Nampa, Idaho 83687

Mailing Address: PO Box 249  
Nampa, Idaho 83687

GPS Coordinates: Lat.: +43.591944°  
Long.: -116.545°  
(Obtained from the facility’s NOI)

Receiving Water: Boise River

Permit #: IDR05C145

Number of Employees: There are 19 employees at the Nampa location. There are close to 800 employees company-wide.

Length of Operation: The facility began operating at this location since at least 2007. Mr. Cataldo was unsure of the operational status prior to 2007 as he started with the company in 2007.

Facility Size: Approximately 8 acres

Annual Revenue: Annual revenue was approximately \$750,000 gross for 2014.

## II. Inspection Information

<b>Inspection Date</b>	July 22, 2015
<b>Time Arrived</b>	9:05 AM
<b>Time Departed</b>	12:55 PM
<b>Weather Condition</b>	Clear and Dry
<b>Facility Representatives</b>	<ul style="list-style-type: none"> <li>• Michael Cataldo (present throughout the inspection)</li> <li>• Jacob Haun (present throughout the inspection)</li> <li>• Kirby Farner (present by phone during the closing conference)</li> <li>• Matt Brown (present for the facility tour)</li> </ul>
<b>EPA Inspection Team</b>	<ul style="list-style-type: none"> <li>• Sandra Brozusky (Lead Inspector)</li> <li>• Joe Roberto</li> </ul>
<b>Observed Discharge</b>	I did not observe any stormwater discharge on this day.
<b>Handouts Provided</b>	<ul style="list-style-type: none"> <li>• U.S. EPA Small Business Resources Information Sheet</li> <li>• Business Cards</li> </ul>

## III. Scope of Inspection

The primary focus of this inspection was to conduct a compliance evaluation inspection to determine compliance with the Multi-Sector General Permit for Stormwater

Discharges Associated with Industrial Activity (MSGP) and Section 402 of the Clean Water Act. For this facility, this meant evaluating the management of stormwater at the site.

In general, this inspection consisted of an opening conference to discuss the purpose and expectations of the inspection, a facility tour to inspect potential stormwater impacted areas of the site, a records review, and a closing conference to discuss the areas of concern identified during the inspection.

We did not collect samples at the time of this inspection.

#### **IV. Inspection Entry**

Specifics regarding entry at this facility are as follows:

- This was an announced inspection. The inspection team contacted Mr. Farner the day prior to the inspection.
- The inspection team presented credentials to Mr. Michael Cataldo upon arriving at the facility.
- I (Sandra Brozusky) explained to Mr. Cataldo that this visit was a compliance inspection to determine compliance with the MSGP and the Clean Water Act.
- Mr. Cataldo did not deny the inspection team access to the facility.
- Mr. Cataldo accompanied the inspection team throughout the inspection.
- We (the inspection team) were allowed to inspect all areas of the facility that we wished to inspect.

#### **V. Compliance History**

Date of Last Inspection: This facility has not been inspected by EPA since the facility obtained coverage under the 2008 MSGP on April 23, 2009, according to Mr. Cataldo.

Enforcement Actions: This facility has not been issued any penalty or compliance orders for purposes of compliance with the MSGP since the facility obtained coverage under the 2008 MSGP on April 23, 2009, according to Mr. Cataldo.

#### **VI. Facility Description/Background**

Pacific Steel and Recycling is an operation that collects, handles, sorts, processes, and transports various types of recyclable materials including ferrous scrap materials (such as automobiles and motor blocks), non-ferrous scrap materials (such as aluminum, copper, brass, lead, stainless steel and white goods). Pacific Steel and Recycling also recycles cardboard. According to Mr. Cataldo the facility received materials from various

customers including industry, the public and public utilities.

In general, this facility consists of two buildings where various indoor activities are conducted and outdoor storage areas where various types of products and recyclable materials are stored and processed. One building houses the facility offices as well as a drive through area where the general public can drop off non-ferrous recyclable materials. This building in the northeast corner of the property is located at the main entrance to the facility. The second building is used for sorting and baling materials.

In addition to the three buildings mentioned above, material storage and other activities are also conducted outdoors in uncovered areas that are exposed to precipitation. All the various types of recyclable materials mentioned above are typically stored outdoors at various times during the processing of these materials.

## **VII. Permit Information**

At the time of the inspection, the facility was covered under the MSGP (Permit # IDR05C145). See Attachment D for a copy of the NOI submitted for this facility. See also Attachment E for a copy of the permit coverage letter dated October 22, 2011. This permit coverage letter establishes that the permit was issued to Pacific Steel and Recycling and that coverage under the MSGP began on November 21, 2011.

## **VIII. Permit Applicability and Requirements**

The facility's NOI for coverage under the MSGP indicates that the Standard Industrial Classification (SIC) code for the activity conducted at this facility is 5093 (Scrap and Waste Materials). According to Appendix D of the MSGP, facilities that fall under SIC code 5093 are eligible for permit coverage under the MSGP.

Coverage under the MSGP means that this facility is responsible for complying with MSGP requirements including the following:

- Prepare a Stormwater Pollution Prevention Plan (SWPPP) to cover stormwater related activities at the facility as established in Part 5 of the MSGP.
- Conduct and document routine facility inspections as established in Part 4.1 of the MSGP. These routine facility inspections must be conducted at least quarterly.
- Conduct and document quarterly visual assessments of stormwater discharges as established in Part 4.2 of the MSGP. These visual assessments must be conducted quarterly.
- Conduct quarterly benchmark monitoring for COD, TSS, total recoverable aluminum, total recoverable iron, total recoverable copper, total recoverable lead,

and total recoverable zinc as established in Part 8 Subsector N of the MSGP.

- Prepare and submit discharge monitoring reports (DMRs) which document the results of quarterly benchmark monitoring as established in Part 7.1 of the MSGP.
- Perform corrective actions to assure that stormwater discharges from the facility are achieving benchmark limitations as established in Part 3 of the MSGP.
- Prepare and submit an annual report to EPA that documents, among other things, the corrective actions conducted during the calendar year as established in Part 7.2 of the MSGP.

These listed permit requirements were the primary focus of the inspection. Where deficiencies were observed, I have documented them in the “Areas of Concern” section of this report.

## **IX. Facility Tour**

During the facility tour we examined all areas occupied by this facility including the material storage areas, stormwater drainage pathways, liquids storage areas, stormwater collection systems, and the stormwater outfall locations.

## **X. Records Review**

As part of the inspection, I requested that the following documents be produced for review:

- **NPDES Permit** – At the time of the inspection, Mr. Cataldo did produce a copy of the MSGP.
- **SWPPP** – At the time of the inspection, I was provided with a SWPPP dated December 1999 and amended December 2012. See Attachment C of this report for a copy of this SWPPP.
- **Routine Facility Inspection Reports** – At the time of the inspection, routine facility inspection reports dating back approximately five years were provided for review.
- **Quarterly Visual Assessment Reports** - At the time of the inspection, quarterly visual assessment reports dating back approximately five years were provided for review.
- **Annual Reports** – At the time of the inspection, annual reports dating back five years were provided for review.

Note that the review of the above documents was not a comprehensive review designed

to identify all deficiencies. Rather, the review of these documents was more cursory in nature.

Any records deficiencies observed are listed in the “Areas of Concern” section of this report.

## **XI. Stormwater Generation, Treatment and Discharge**

The operation of this facility is such that stormwater runoff is generated from precipitation falling within the footprint of the facility. This facility is set up such that all stormwater generated onsite is routed to two stormwater ponds located in the north central portion of the property and the southwest corner. See Attachment A for the location of these ponds.

Both of the stormwater ponds were designed for infiltration however, each was also installed with shallow injection wells for water overflow. According to Mr. Brown, the shallow injection wells were permitted by the Idaho Department of Water Resources. In addition, Mr. Brown stated that these ponds have a designed capacity for a 100-year rain event.

Stormwater is routed to these ponds via drains located throughout the property. According to Mr. Brown, the inlets of the stormwater ponds are equipped with oil and water separators and a metal absorbent material as means of treatment.

According to Mr. Brown and Mr. Farner these stormwater ponds were constructed and completed in 2011. Mr. Farner indicated that these ponds were installed to ensure stormwater would not discharge from the facility.

Best management practices used to minimize pollutants entering the stormwater ponds include monthly sweeping of the facility as well as cleaning up spills as needed.

See Attachment B photographs 1 - 4 of this report for details of the stormwater ponds.

## **XII. Receiving Water**

The NOI submitted for this facility identifies the Boise River as the receiving water for stormwater discharges. The Boise River is approximately 6 miles north of the facility.

## **XIII. Areas of Concern**

At the time of the inspection I identified several areas of concern at this facility. These concerns are identified as follows:

**A. Hardness Data Supporting Documentation**

As established earlier in this report, this facility is required to conduct quarterly benchmark monitoring of its stormwater discharges.

Part 8.N.6 of the MSGP identifies the benchmark parameters to be monitored. These parameters include total recoverable copper, total recoverable lead and total recoverable zinc. This part of the permit also specifies that copper, lead, and zinc are hardness dependent which means that the benchmark values for these parameters are dependent on the hardness value for the receiving water.

In addition, Part 6.2.1.1 of the MSGP states that “If your facility is one of the industrial sectors subject to benchmark concentrations that are hardness-dependent, you are required to submit to EPA with your first benchmark report a hardness value, established consistent with the procedures in Appendix J, which is representative of your receiving water.”

An EPA NPDES MSGP inspection was conducted at a separate Pacific Steel and Recycling facility located in Sandpoint, Idaho on July 15, 2015. During this inspection, EPA inspectors asked Mr. Farner what hardness values were used to determine benchmark values for the hardness-dependent parameters. Mr. Farner indicated that the hardness value they have been using is 150 mg/l. Mr. Farner did not know what this number was based on. EPA inspectors asked Mr. Farner if this hardness information was ever submitted to EPA and he said that he did not know.

On July 16, 2015, Mr. Farner sent an email discussing among other things, the concern over the hardness information. This email suggests that hardness information was not supplied to EPA with the first benchmark report as required in Part 6.2.1.1 of the MSGP. See Attachment F of this report for a copy of this email.

During this inspection of Pacific Steel and Recycling’s Nampa facility, Mr. Farner stated that the same hardness concerns would apply to the Nampa facility. However, it should be noted that according to facility representatives, the facility has not had a stormwater discharge since the construction of the stormwater ponds.

**B. Outfall #1**

At the time of inspection we conducted a field tour examining stormwater drainage pathways. According to the facility’s SWPPP and facility representatives, prior to the construction of the stormwater ponds, the facility had a stormwater discharge identified as outfall #1. This outfall was located at the entrance to the facility, along the northern perimeter. At the time of inspection, the slope of the entrance appeared to allow for stormwater to run off site. Facility representatives were unsure if stormwater could discharge from the entrance. Since the installation of the stormwater ponds, the facility has not collected any

samples of stormwater discharges. See Attachment B photographs 5 and 6 for views of the facility entrance.

Following the inspection, Mr. Farner emailed information regarding the slope of the entrance to the facility. See Attachment G for this email. A survey of the property was conducted after the inspection to determine, among other things, the slope of the entrance. Mr. Farner states in this email that the results of this survey demonstrate that the slope near the entrance directs stormwater to the stormwater ponds.

Mr. Farner emailed additional follow-up actions on November 11, 2015. Mr. Farner provided photographs of a regrading project at the entrance of the facility to ensure stormwater would not discharge. See Attachment G for the email including this information.

Mr. Farner also stated in the above mentioned emails that Pacific Steel and Recycling plans to terminate coverage for this facility under the MSGP. Mr. Farner will be utilizing a Professional Engineer certification to demonstrate that the facility will not discharge stormwater up to a 100-year rain event. See Attachment H for this certification.

#### **XIV. Closing Conference**

Prior to concluding the inspection, I held a closing conference with Mr. Cataldo, Mr. Haun and Mr. Farner. The purpose of this closing conference was to discuss the preliminary findings of the inspection. I discussed the areas of concern listed above. I then thanked the facility representatives for their time and assistance with the inspection.

**Report Completion Date:**

11/27/15

**Lead Inspector Signature:**

